

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE	:	
COMMISSION,	:	No. 07-CV-6146
	:	
Plaintiff,	:	ECF case (PKC)
v.	:	
	:	
THEODORE ROXFORD	:	
a/k/a LAWRENCE DAVID NIREN and:	:	
HOLLINGSWORTH, ROTHWELL &	:	
ROXFORD,	:	
	:	
Defendants.	:	
	:	

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NOTICE OF MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANT ROXFORD

PLEASE TAKE NOTICE that on the accompanying Declarations of Mark H. Lineberry and Sarah L. Levine, the accompanying Memorandum of Law, and the entire record of this case, plaintiff Securities and Exchange Commission moves the Court, before the Honorable P. Kevin Castel, United States District Judge, for entry of a default judgment against Defendant Theodore Roxford, also known as Lawrence David Niren ("Defendant Roxford") pursuant to Rule 55(b) (2) of the Federal Rules of Civil Procedure.

In accordance with Local Civil Rule 55.2(b), a form of Clerk's Certificate of Default is attached to the Declaration of Sarah L. Levine as Exhibit 19, a copy of the Commission's

Complaint is attached as Exhibit 20, and a proposed form of default judgment is attached as Exhibit 21.

Dated: Washington, D.C.  
October 31, 2007

Respectfully submitted,

Of Counsel:

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